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7 Attorney for Karen Chapon

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 KAREN CHAPON,  
15 Defendant.

Case No. 2:20-cr-286-JCM-NJK  
UNOPPOSED MOTION TO  
CONDUCT A PRE-PLEA PRE-  
SENTENCE INVESTIGATION  
REPORT AND PROPOSED ORDER

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17 The defendant, Karen Chapon, by and through her attorney of record, Brian Pugh,  
18 Assistant Federal Public Defender, files this Unopposed Motion to Conduct a Pre-Plea Pre-  
19 Sentence Investigation Report on Karen Chapon.

20 On October 21, 2020, Ms. Chapon was charged by indictment with four counts of Bank  
21 Fraud in violation of 18 U.S.C. § 1344(2), two counts of False Statement to a Financial  
22 Institution, 18 U.S.C. § 1014, and one count of Unlawful Monetary Transaction in violation of  
23 18 U.S.C. § 1957. ECF No. 22.

24 Ms. Chapon is in the process of deciding whether to plead guilty to the charges and  
25 thereby eliminate the need for this Court to conduct a trial. However, she is uncertain regarding  
26 the implications of her criminal history on her potential sentencing guideline calculation. Ms.

1 Chapon's criminal history calculation and sentencing guideline range will necessarily affect the  
2 outcome and disposition of the case. Counsel and Ms. Chapon are unable to definitively  
3 determine her sentencing guideline range without knowing her entire criminal history and  
4 therefore a pre-plea pre-sentence investigation report is requested.

5 To satisfy Ms. Chapon's concerns and to assure that she has the information she needs  
6 to make a truly knowing and intelligent decision, as whether to plead guilty, she has requested  
7 that a pre-plea pre-sentence investigation report be completed. Undersigned counsel has spoken  
8 with the government and it does not oppose this motion. Trial in this matter is set for May 17,  
9 2021.

10 For the reasons stated above, the parties respectfully request that a pre-plea pre-sentence  
11 investigation report be conducted in this matter.

12 DATED this 26<sup>th</sup> day of February 2021.

13 RENE L. VALLADARES  
14 Federal Public Defender

*/s/ Brian Pugh*

15 By: \_\_\_\_\_

16 BRIAN PUGH  
17 Assistant Federal Public Defender  
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

Karen Chapon,

Defendant.

Case No.: 2:20-cr-286-JCM-NJK

**ORDER**

The reasons being sound, the parties being in agreement and the best interests of justice and judicial economy being served:

IT IS HEREBY ORDERED that the Probation Department prepare a pre-plea presentence investigation report for Karen Chapon.

DATED March 19, 2021.

  
UNITED STATES DISTRICT JUDGE